

**TROY LAW, PLLC**

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August 11, 2021

**Via ECF**

Hon. Vernon S. Broderick, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: Plaintiffs Request for Extension of Time to File Attorney Fees and Cost  
Invoice for Settled Plaintiffs**

*Wang v. Shun Lee Palace Restaurant, Inc.*, No. 17-cv-00840 (VSB), (S.D.N.Y.)

Your Honor,

This office represents the named Plaintiffs Guoyi Wang, Tongwei Wu, and Zhiqiang Lu, and the opt-in Plaintiffs Steven Cheung, Quekyeow Yap, Haiping Wu, Weijun Zhen, Shude Zhang, Keeyew Foo, Tsunming Fong, Terry Wong, Mingsung Chan, Leungack Choi, Fong Yue, Guoliang Xu, Billy Qin, and Monaliza Wong in the above-referenced matter. We write respectfully and in response to the two settlement agreements that was provided to the court on August 6, 2021. This office respectfully requests a two-week extension to File their Attorney Fees and Costs Invoice for the Plaintiffs that this office previously represented that Settled in the action. Granting such request will not grant any prejudice on any party in the matter since the settlement agreement has already been provided and this office would like to collect the fees and cost, they are entitled to for litigating the case on behalf of the plaintiffs that they represented that settled.

On August 6, 2021, Hang & Associates, who represent Plaintiffs Cheng Xia Wang, Bao Guo Zhang, Chunline Zhang, Ze Jun Zhang, Jun Qing Zhao, Ya Qiang Zhang, Hui Liang Zhao, Jun Ling Zhao, Huimin Zhao, Jing Sheng Guan, and Li Weng, filed their Settlement Agreement for their Plaintiffs. Hang & Associates filed three difference Settlement Agreements for the Plaintiffs that they represent and their Attorney Fees and Costs Invoice for litigating the case. The Settlement Agreements that were filed are pending before the court and have not been ruled on by Your Honor yet.

On March 25, 2021, this counsel filed their Motion for Charging Lien for Plaintiffs Cheng Xia Wang, Jun Qing Zhao and Ze Jun Zhang a/k/a Zejun Zhang. This office represented these Plaintiffs from August 29, 2016 to July 26, 2019. The Motion for Charging Lien on these Plaintiffs is still pending before the court and in light of the Settlement Agreement that has been made this office request an extension of time to file their Attorney Fees and Costs Invoice for the Plaintiffs that this counsel represented that have decided to settle. This office believes that they are entitled to their Attorney Fees and Costs for litigating the case on behalf of the plaintiffs that settled. In light of the Settlement Agreement that was provided to the court, this office requests two weeks extension to provide the court with the Attorney Fees and Costs Invoice for the plaintiffs that they represented that have decided to settle. Two weeks will give this office enough time to get the

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invoices ready for the plaintiffs that this office previously represented and provide it to the court so this office can be awarded for the litigation that they endured for plaintiffs that they represented.

For the reasons stated above this office requests a two-week extension to file their Attorney Fees Costs Invoice for Plaintiffs Cheng Xia Wang, Jun Qing Zhao and Ze Jun Zhang a/k/a Zejun Zhang.

We thank the Court for its attention to and consideration of this matter and apologize for inconveniencing the court.

Respectfully submitted,  
TROY LAW, PLLC

/s/ John Troy

John Troy

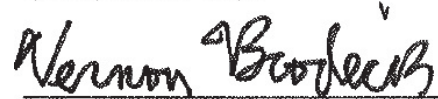
*Attorney for Plaintiffs*

cc: via ECF  
all counsel of record

*JT/gd*

I am in receipt of Troy Law's attorneys' fees and costs invoices regarding Plaintiffs Cheng Xia Wang, Jun Qing Zhao and Ze Jun Zhang, filed in connection with Troy Law's motion for a charging lien. (Doc. 216-2.) To the extent that Troy Law wishes to supplement that record, Troy Law is hereby directed to file any additional invoices concerning those plaintiffs by on or before August 26, 2021.

**SO ORDERED:**



HON. VERNON S. BRODERICK 8/12/2021  
UNITED STATES DISTRICT JUDGE